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Attorneys for Defendant TMIF II Portola, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA
11 ex rel. PEGGY THORNTON, Relator,

12 | and

12 PEGGY THORNTON,

Plaintiff,

15 | VS.

16 PORTOLA DEL SOL OPERATOR, LLC,
17 a foreign limited-liability company; TMIF
18 II PORTOLA, LLC, a foreign limited liability
19 company; APARTMENT MANAGEMENT
CONSULTANTS, LLC, a foreign limited
liability company, and RENE RICHARDSON,
as AGENT of PORTOLA DEL SOL
OPERATOR, LLC,

Defendants.

Case No.: 2:21-cv-01123-APG-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
RESPONSIVE PLEADINGS TO FIRST
AMENDED COMPLAINT**

[First Request]

22 Plaintiff Peggy Thornton (“Thornton”) (collectively “Plaintiff”), Defendant TMIF II
23 Portola, LLC (“TMIF”), by and through their undersigned attorneys, and pursuant to LR IA 6-1,
24 submit the following Stipulation to Extend Time to File Responsive Pleadings to the First Amended
25 Complaint (“FAC”) up to and including January 19, 2024. In support of the Stipulation, the parties
26 state the following:

27 1. TMIF's responsive pleading to Plaintiff's FAC is currently due December 22, 2023.

28 | //

1 2. Because counsel for TMIF is currently in trial in another matter and due to the
 2 impending holidays, Plaintiff requested a four-week extension until January 19, 2024.

3 3. Counsel for Plaintiff has agreed to the requested extension and the requested
 4 extension will not impact any other deadlines in this case.

5 4. This is the first request to extend the deadline for TMIF to file their responsive
 6 pleading to Plaintiff's FAC.

7 5. This request for an extension of time is not intended to cause any undue delay or
 8 prejudice to any party.

9 6. Therefore, the Parties hereby stipulate that the deadline for TMIF to file their
 10 responsive pleadings shall be extended through January 19, 2024.

11 Dated this 21st day of December, 2023.

12 NEVADA LEGAL SERVICES, INC.

13 McDONALD CARANO LLP

14 By: /s/ Peter C. Wetherall

15 Peter C. Wetherall (NSBN 4414)
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20 *Attorneys for Plaintiffs*

21 By: /s/ Rory T. Kay

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27 *Attorneys for Defendant TMIF II Portola, LLC*

28 **IT IS SO ORDERED:**



29 UNITED STATES MAGISTRATE JUDGE

30 DATED: 12/22/2023